March 24, 2022

CRA BASICS

Catherine Petrusz, CRA Coordinator
About NCRC

The National Community Reinvestment Coalition and its grassroots member organizations create opportunities for people to build wealth.

NCRC members include

- community reinvestment organizations;
- community development corporations;
- local and state government agencies;
- faith-based institutions;
- community organizing and civil rights groups;
- minority and women-owned business associations; and
- local social service providers from across the nation.

NCRC Programs & Services

- Agenda-setting research
- Renovate and build affordable homes for low- and moderate-income families
- Counseling for home buyers and owners
- Business-building expertise for entrepreneurs
- Train and support housing counselors
- Test and challenge discrimination in financial services and housing
- Convene and facilitate agreements between financial institutions and community networks to increase lending, investments and philanthropy in neighborhoods that need it
- Represent members before Congress and federal regulatory agencies
- Routinely cited by journalists, economists and scholars focused on banking, housing, urban renewal, rural development and civil rights
Overview and Housekeeping

Today’s Presentation

1. Brief History of CRA
2. CRA Implementation and Issues with Enforcement
3. How to Get Involved: CRA Advocacy and Community Benefits Agreements
4. What does NCRC do to help?

Housekeeping

Questions: Use the Q&A tool for questions. I’ll address as many as I can at the end of the webinar.

Chat: if you are comfortable doing so please put your name or organization, and your location, into the chat.
BRIEF HISTORY OF THE COMMUNITY REINVESTMENT ACT
"National banks are instrumentalities of the federal government, created for a public purpose."

U.S. Supreme Court, Davis v. Elmira Savings Bank, 161 U.S. 275 (1896)
• A **good bank** can anchor a vibrant community

• It can be as important to the success of a community as a good school, or a hospital

• Like some public institutions, **banks have obligations too**

• They have an obligation to address **community needs**

• They have an obligation to produce a **public benefit**
CRA and Redlining

Redlining was a decades long practice by both the public and private sector, to refuse to make loans certain communities deemed to carry lending risk based on class, race or immigrant status.

1939 HOLC "redlining" map of central Los Angeles, courtesy of LaDale Winling and urbanoasis.org.
Ongoing Impact of Redlining

2021:
Justice Department announced an initiative to combat redlining.

January 31, 2023:

United States v. City National Bank

View the legacy of redlining and its connection to health outcomes in 140 cities:
Redlining and Neighborhood Health » NCRC
COMMUNITY REINVESTMENT ACT (CRA)

CRA was among a series of legislative attempts to end redlining and discrimination in housing.

➢ Fair Housing Act (1968): prohibits discrimination
➢ Equal Credit Opportunity Act (1974): prohibits discrimination
➢ Home Mortgage Disclosure Act (1975): disclosures
➢ Community Reinvestment Act (1977): affirmative obligation
COMMUNITY REINVESTMENT ACT (CRA)

- **1989**: Update to CRA requiring the bank supervisors to publicly disclose CRA ratings and performance evaluations.

- **1995**: Most recent CRA regulatory reform created CRA exams as we know them today.

- **Coming Soon**: Final revised CRA regulations.
Bank obligations under CRA


(a) The Congress finds that—

(1) regulated financial institutions are required by law to demonstrate that their deposit facilities serve the convenience and needs of the communities in which they are chartered to do business;

(2) the convenience and needs of communities include the need for credit services as well as deposit services; and

(3) regulated financial institutions have continuing and affirmative obligation to help meet the credit needs of the local communities in which they are chartered.
Bank obligations under CRA


(b) It is the purpose of this chapter to require each appropriate Federal financial supervisory agency to use its authority when examining financial institutions, to encourage such institutions to help meet the credit needs of the local communities in which they are chartered consistent with the safe and sound operation of such institutions.
Benefits of CRA

CRA-covered institution lending in LMI communities since 1996:

• $883 billion in loans for affordable housing and economic development projects
• $973 billion in 24 million small business loans

Economists also find that CRA-covered lending is safer and sounder than non-CRA covered lending.
HOW THE CRA IS IMPLEMENTED, AND SOME ENFORCEMENT ISSUES
Performance Evaluations (aka "CRA exams")

- CRA’s basic tool for enforcement
- Every 3-4 years
- Conducted by the bank’s primary federal regulator
- Opportunity for public comment
- Evaluated:
  - How well they are lending to LMI borrowers and neighborhoods
  - The level of support for community development projects
  - Maintaining branches in LMI neighborhoods
Performance Evaluations: the Examiners

• Federal Deposit Insurance Corporation (FDIC);

• Federal Reserve Board (FRB); or

• Office of the Comptroller of the Currency (OCC)
Performance Evaluations: CRA Ratings

Banks can receive the following ratings on CRA exams:

PASS
- Outstanding
- Satisfactory

FAIL
- Needs to Improve
- Substantial Non-compliance
Performance Evaluations: Component Tests

- The ratings are based on bank performance on three separate tests, sometimes referred to as component tests.
- Banks' ratings are based on data analysis, reviews of records, and public comments.
CRA exams measure a bank performance within its geographic “assessment areas.”

- Areas where the bank has branches, ATMs, main office, and surrounding geographies in which the bank has originated or purchased a majority of its loans.
- Must consist generally of one or more metropolitan statistical areas (MSAs); metropolitan divisions; or one or more contiguous political subdivisions, such as counties, cities, or towns.
- Cannot arbitrarily exclude LMI neighborhoods.
Performance Evaluations: Lending Test

For each assessment area, the lending test evaluates:

- The amount of home mortgage loans, small business loans and small farm loans, the bank has made in its community
- The community development lending, with added emphasis on flexible, complex or innovative lending
- The income levels of both the assessment area and the borrowers receiving these loans
Performance Evaluations: *Investment Test*

For each assessment area, the *investment test* evaluates:

- The amount of bank investments that have a community development purpose (for example, low income housing tax credit investments)
- Complexity
- Innovation
- Responsiveness to the community development needs of the community
Performance Evaluations: Services Test

For each assessment area, the services test evaluates:

- **Retail banking services**
  - Focus on the distribution of the bank’s branch network, *in particular whether there are branches in LMI census tracts within the bank’s assessment areas*

- **Community development services**
  - Must be related to providing a financial service or use the financial expertise of the banker. Examples:
    - Low-cost checking accounts that make deposit services accessible to individuals with low incomes.
    - Financial literacy programs for school children.
    - Bank employee volunteer hours serving on non-profit boards
Identify a Bank
- Primary Regulator
- CRA Rating

Research Bank Performance
- CRA Exam
- Assessment Areas
- Lending Data

CRA Advocacy
- Comment Letters
- Community Benefits Agreements
Researching a Bank: First Questions

• Who is the bank’s primary federal regulator (OCC, FRB or FDIC)?

• What is the bank’s CRA rating?
Researching a Bank: Tools

- FDIC BankFind Suite
- FFIEC Interagency CRA Rating Search
- OCC Performance Evaluations
- FDIC Performance Evaluations
- Federal Reserve Performance Evaluations
Researching a Bank: primary federal regulator, branch locations

**FDIC**

**U.S. Bank National Association**

**Institution Details**

- **FDIC Cert #:** 6054
- **Established:** 07/12/1990
- **Bank Charter Class:** National Bank, Member of the Federal Reserve System (FRS)
- **Primary Federal Regulator:** Federal Deposit Insurance Corporation (FDIC)
- **Secondary Federal Regulator:**

Get additional detailed information by selecting from the following:

- **Locations**
- **History**
- **Institution Profile**
- **Other Names**

**2,233 Branch Offices**

<table>
<thead>
<tr>
<th>UNIBN</th>
<th>Branch Number</th>
<th>Name</th>
<th>Address</th>
<th>City</th>
<th>County</th>
<th>State</th>
<th>Service Type</th>
<th>Established</th>
<th>Acquired</th>
</tr>
</thead>
<tbody>
<tr>
<td>3001</td>
<td>167</td>
<td>Openhein klein Branch</td>
<td>811 North Main Street, Oakville, WI 53105</td>
<td>Oshkosh</td>
<td>Winnebago</td>
<td>WI</td>
<td>Full Service - Branch and Locker</td>
<td>06/11/2001</td>
<td>09/11/2009</td>
</tr>
<tr>
<td>3073</td>
<td>162</td>
<td>Center Branch</td>
<td>777 East Washington Avenue, Waukesha, WI 53186</td>
<td>Waukesha</td>
<td>Waukesha</td>
<td>WI</td>
<td>Full Service - Branch and Locker</td>
<td>01/01/2003</td>
<td>10/12/2009</td>
</tr>
<tr>
<td>307216</td>
<td>410</td>
<td>Milwaukee Madison Branch</td>
<td>30924 University Avenue, Milwaukee, WI 53205</td>
<td>Milwaukee</td>
<td>Dane</td>
<td>WI</td>
<td>Full Service - Branch and Locker</td>
<td>03/01/2001</td>
<td>09/11/2009</td>
</tr>
</tbody>
</table>
Researching a Bank:  
What is a bank’s CRA rating?

<table>
<thead>
<tr>
<th>Charter/Docket</th>
<th>Bank</th>
<th>City</th>
<th>State</th>
<th>Evaluation Date</th>
<th>Rating</th>
<th>Examination</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>U.S. Bank National Association</td>
<td>Cincinnati</td>
<td>OH</td>
<td>10/16/2017</td>
<td>Outstanding</td>
<td>Large Bank</td>
</tr>
<tr>
<td>24</td>
<td>U.S. Bank National Association</td>
<td>Cincinnati</td>
<td>OH</td>
<td>03/31/2012</td>
<td>Satisfactory</td>
<td>Large Bank</td>
</tr>
<tr>
<td>24</td>
<td>U.S. Bank National Association</td>
<td>Cincinnati</td>
<td>OH</td>
<td>12/31/2008</td>
<td>Outstanding</td>
<td>Large Bank</td>
</tr>
<tr>
<td>24</td>
<td>U.S. Bank National Association</td>
<td>Cincinnati</td>
<td>OH</td>
<td>12/31/2005</td>
<td>Outstanding</td>
<td>Large Bank</td>
</tr>
</tbody>
</table>
Example: U.S. Bank
What are a bank’s lending, investment and services test ratings?

<table>
<thead>
<tr>
<th>Performance Levels</th>
<th>U.S. Bank National Association Performance Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lending Test*</td>
</tr>
<tr>
<td>Outstanding</td>
<td>X</td>
</tr>
<tr>
<td>High Satisfactory</td>
<td></td>
</tr>
<tr>
<td>Low Satisfactory</td>
<td></td>
</tr>
<tr>
<td>Needs to Improve</td>
<td></td>
</tr>
<tr>
<td>Substantial Noncompliance</td>
<td></td>
</tr>
</tbody>
</table>

* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.
Example: U.S. Bank
What are a bank’s ratings for each of its assessment areas?

### Appendix B: Ratings Summary

<table>
<thead>
<tr>
<th>U.S. Bank National Association CRA Ratings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall Bank:</td>
</tr>
<tr>
<td>U.S. Bank National Association</td>
</tr>
<tr>
<td>Multistate Metropolitan Rated Areas:</td>
</tr>
<tr>
<td>Chicago-Naperville-Elgin, IL-IN-WI</td>
</tr>
<tr>
<td>Cincinnati, OH-KY-IN</td>
</tr>
<tr>
<td>Clarksville, TN-KY</td>
</tr>
<tr>
<td>Davenport-Moline-Rock Island, IA-IL</td>
</tr>
<tr>
<td>Fargo, ND-MN</td>
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<tr>
<td>Grand Forks, ND-MN</td>
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<tr>
<td>Kansas City, MO-KS</td>
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<tr>
<td>Lewiston, ID-WA</td>
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<tr>
<td>Logan, UT-ID</td>
</tr>
<tr>
<td>Louisville/Jeffereon County, KY-IN</td>
</tr>
<tr>
<td>Minneapolis-St. Paul-Bloomington, MN-WI</td>
</tr>
<tr>
<td>Omaha-Council Bluffs, NE-IA</td>
</tr>
<tr>
<td>Portland-Vancouver-Hillsboro, OR-WA</td>
</tr>
</tbody>
</table>
Low-to-Moderate Income Defined

The CRA regulations specifically define "low" and "moderate" according to criteria defined by the U.S. Census Bureau.

- An individual or household is considered LMI if they are 80% or under the area median income.
- A census tract is LMI if the median family income is less than or equal to 80% of the area median income.
- Area Median Income: The median is the mid-point, where half of the population makes more than this amount and half makes less.
How are the regulators doing?

How Well Are Regulators Evaluating Banks Under the Community Reinvestment Act?

Are CRA grades reflecting what people are seeing in their communities?
In 2014, 98.26% of banks passed their performance evaluations. Only 1.74% failed. This closely mirrors the pass rate for both 2012 and 2013. 2012: 97.52% passed/2.48% failed 2013: 97.60% passed/2.39% failed

In 2014, 76% of states in the U.S. had 100% of banks headquartered in their state and up for exams pass their CRA performance evaluations. Maine is the only state that didn’t have a bank examined in 2014.

In the last THREE years, among all regulators...

400 banks received **Outstanding**, the highest possible grade, on their CRA performance evaluation

10 banks received **Substantial Noncompliance**, the lowest possible grade, on their CRA performance evaluation
Questions?

1. Brief History of CRA

2. CRA Implementation and Issues with Enforcement

3. How to Get Involved: CRA Advocacy and Community Benefits Agreements

4. What does NCRC do to help?
HOW TO GET INVOLVED: CRA ADVOCACY AND COMMUNITY BENEFITS AGREEMENTS
CRA WORKS WHEN YOU DO

“Full responsibility for CRA enforcement has always been the job of people in the neighborhoods.”

Gale Cincotta, former Chairperson, National People's Action; Co-Founder and former Executive Director, National Training and Information Center
CRA Enforcement

**Why get involved?**

- Improve bank performance, especially if they’re not serving everyone
- Increase resources for community development
- Direct more resources into underserved neighborhoods
- Build partnerships with financial institutions
### Understanding Lending Data: Home Lending

#### Example of HMDA Data for a bank in one assessment area

<table>
<thead>
<tr>
<th>Applicant Characteristic</th>
<th>Population</th>
<th>All Lenders</th>
<th>Bank</th>
<th>Percentage Point Difference</th>
<th>All Lenders</th>
<th>Bank</th>
<th>Percentage Point Difference</th>
<th>All Lenders</th>
<th>Bank</th>
<th>Percentage Point Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race/Ethnicity</strong></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>40.8%</td>
<td>56.1%</td>
<td>66.7%</td>
<td>10.5%</td>
<td>74.4%</td>
<td>65.6%</td>
<td>-8.8%</td>
<td>7.4%</td>
<td>8.2%</td>
<td>0.8%</td>
</tr>
<tr>
<td>Black</td>
<td>43.6%</td>
<td>16.9%</td>
<td>5.0%</td>
<td>-11.9%</td>
<td>56.4%</td>
<td>50.0%</td>
<td>-6.4%</td>
<td>19.7%</td>
<td>33.3%</td>
<td>13.6%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>7.8%</td>
<td>3.9%</td>
<td>1.7%</td>
<td>-2.2%</td>
<td>66.5%</td>
<td>100.0%</td>
<td>33.5%</td>
<td>12.1%</td>
<td>0.0%</td>
<td>-12.1%</td>
</tr>
<tr>
<td>Asian</td>
<td>5.9%</td>
<td>7.8%</td>
<td>6.7%</td>
<td>-1.1%</td>
<td>69.9%</td>
<td>50.0%</td>
<td>-19.9%</td>
<td>8.9%</td>
<td>25.0%</td>
<td>16.1%</td>
</tr>
<tr>
<td>Minority</td>
<td>59.2%</td>
<td>30.3%</td>
<td>13.3%</td>
<td>-16.9%</td>
<td>61.6%</td>
<td>53.3%</td>
<td>-8.3%</td>
<td>14.8%</td>
<td>26.7%</td>
<td>11.9%</td>
</tr>
<tr>
<td><strong>Income</strong></td>
<td></td>
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<tr>
<td>LMI Applicant</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>MUI Applicant</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Applicant in LMI Tract</td>
<td>21.0%</td>
<td>10.0%</td>
<td>-11.0%</td>
<td>-1.9%</td>
<td>58.6%</td>
<td>40.0%</td>
<td>-18.6%</td>
<td>18.7%</td>
<td>26.7%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Applicant in MUI Tract</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Applicant in Minority Tract</td>
<td>35%</td>
<td>11.9%</td>
<td>10.0%</td>
<td>-1.9%</td>
<td>58.0%</td>
<td>66.7%</td>
<td>8.6%</td>
<td>18.9%</td>
<td>22.2%</td>
<td>3.3%</td>
</tr>
<tr>
<td>Applicant in Minority Tract</td>
<td>65%</td>
<td>88.1%</td>
<td>90.0%</td>
<td>1.9%</td>
<td>69.8%</td>
<td>63.5%</td>
<td>-6.3%</td>
<td>9.7%</td>
<td>9.4%</td>
<td>-0.3%</td>
</tr>
<tr>
<td>Applicant in Minority Tract</td>
<td>57%</td>
<td>28.7%</td>
<td>18.3%</td>
<td>-10.4%</td>
<td>60.4%</td>
<td>61.1%</td>
<td>0.7%</td>
<td>16.7%</td>
<td>16.7%</td>
<td>0.0%</td>
</tr>
</tbody>
</table>

**Understanding the Data:**

- **Denial Rate** shows the percentage of loan applications that were denied.
- **Approval Rate** shows the percentage of loan applications that were approved.
- **Percentage Point Difference** indicates the difference in approval or denial rates between different groups.

This data helps to identify biases and disparities in lending practices across different groups and tracts.
## Understanding Lending Data: Small Business Lending

### Summary of Small Business Lending - Community Bank

<table>
<thead>
<tr>
<th></th>
<th>Number of Business</th>
<th>Percent of Business</th>
<th>CommunityBank</th>
<th>All Lenders</th>
<th>Percentage Point Difference:</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMI Census Tracts</td>
<td>39,442</td>
<td>23.91%</td>
<td>220</td>
<td>8,615</td>
<td>9.65%</td>
</tr>
<tr>
<td>Businesses &lt;$1 mil in Revenue</td>
<td>115,705</td>
<td>70.15%</td>
<td>18</td>
<td>17,697</td>
<td>-43.72%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>164,936</td>
<td>100.00%</td>
<td>683</td>
<td>38,178</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

Example of small business data for a bank in its Springfield MSA
Lending Data

HMDA Data is available online from the CFPB:
The Home Mortgage Disclosure Act | Consumer Financial Protection Bureau (consumerfinance.gov)

Small business lending data is available online from FFIEC (Federal Financial Institutions Examination Council):
CRA Data Products (ffiec.gov)
How to get involved

Identify a Bank
- Primary Regulator
- CRA Rating

Research Bank Performance
- CRA Exam
- Assessment Areas
- Lending Data

CRA Advocacy
- Comment Letters
- Community Benefits Agreements
How to get involved: *Public Comment Letters*

- Mergers and branch acquisitions
- CRA Performance Evaluations
- Branch Closures
# How to get involved: *Public Comment Letters*

<table>
<thead>
<tr>
<th>Public comment requests</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Support or opposition to a filing</td>
<td>Request to extend the comment period, or to convene a meeting or public hearing</td>
</tr>
<tr>
<td>Recommendation that the OCC grant approval only if the OCC imposes certain conditions</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Information to back up your position or request can include:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Data analysis</td>
<td>Other information relevant to a bank’s CRA performance and your community</td>
</tr>
<tr>
<td>How your organization or coalition can improve performance</td>
<td></td>
</tr>
</tbody>
</table>
How to get involved: *Comment on a Mergers and Branch Acquisitions*

- Banks must apply to acquire branches or other financial institutions, and the public can comment on those applications.

- When approving mergers, regulators have a general obligation under the law to "*take into consideration...the convenience and needs of the community to be served.*"

- Regulators look at previous record, as well as how the expanding bank will serve communities going forward.

- Opportunity to negotiate public benefits plans.
Comment Period:

Deadline for comments on mergers is fast - usually 30 days from receipt of a merger application.
How to get involved: Merger Public Meetings

“In recognition of the value that public input can provide on mergers, the OCC is considering options to facilitate such input. For example, for mergers involving larger banks, the OCC is considering adopting a presumption in favor of holding public meetings.”

Acting Comptroller of the Currency Michael J. Hsu
Remarks at Brookings “Bank Mergers and Industry Resiliency”
May 9, 2022
How to get involved:

Comment on a CRA Exam

Is a bank meeting the credit needs of its entire community, including low- and moderate-income neighborhoods?

Each regulator publishes its CRA exam schedule. Comments submitted before the close of the CRA exam will be considered in the performance evaluation.

- FDIC: CRA Report
- Community Reinvestment Act (CRA) Evaluations Coming Due | OCC (treas.gov)
- Community Reinvestment Act - Exam Schedule (federalreserve.gov)
Using CRA:

*Comment on Branch Closures*

- People in LMI neighborhoods can request that regulators hold a public meeting to discuss how the neighborhood will be served in the future.

- Regulators cannot prevent a bank from closing a branch, but the public can still protest the closure.

- Can result in a public benefits agreement, delay of closure or donation of building/equipment for CRA eligible purposes.
Using CRA: Community Benefits Agreements

**What?** An agreement between a bank, NCRC, and our members, in which the bank commits to increases in CRA activity, usually in connection with a merger.

- Goals to increase CRA-eligible mortgage lending, small business lending, community development, and philanthropy
- Commitments to activities to address pressing needs identified by our members

**Why?** Ideal model for bank-community engagement and CRA

- Banks and community groups work together to agree to clear metrics to evaluate successful bank performance, and on strategies for meeting increases
Organizing Team works with our members in the bank's footprint

- Identify pressing local needs
- Prepare our members for meetings with the bank to discuss needs and make recommendations

Meeting Goals

- Introduce the bank to an impressive network of nonprofits that can help the bank achieve CRA goals and get CRA credit
- But, if needed, the member network can be called upon to submit comments and take other actions to increase pressure if needed

Using CRA: How do we get CBAs?

Listening Sessions
Using CRA: How do we get CBAs?

**CBA Negotiations**

**NCRC Proposal**
- Proposed lending goals
- Comprehensive list of strategies and priorities identified by our members in meetings with the bank

**CBA Draft**
- Bank will create a draft CBA
- NCRC shares the draft CBA with members for feedback
- NCRC works with the bank to agree to a final CBA that addresses a majority of our member issues, and that contains clear goals and performance metrics
Using CRA: When do we get CBAs?

**Mergers**
- Bank merger law requires that banks show the merger will benefit the public
- Public has the ability to weigh in on how well the bank has performed and on pressing needs

**Renewals**
- Banks will sometimes reach out to NCRC for a CBA renewal; we treat these as new CBAs
Using CRA: What’s next after a CBA announcement?

Advisory Councils

• NCRC works with the bank to create Community Advisory Councils

Collaboration

• Organizing Team works on unlocking and deploying the resources in a collaborative way with key stakeholder input
Using CRA: Community Benefits Agreements Results

22 Banks

Over $600 billion to underserved borrowers and communities

Nearly 130 new bank branches in LMI communities

More Details:
NCRC CBA Explainer
Using CRA: *Community Benefits Agreements Results*

**First Tennessee Bank: Financing for CDFIs**
- Increased financing for CDFI’s from $150,000 to $9.4 million

**Huntington Bank: Mortgage Lending to Black Borrowers**
- **Year One**
  - Home purchase loans: 37%
  - Home improvement loans: 20%
  - All HMDA lending: 20%
- **Year Two**
  - Home purchase loans to black borrowers increased again by another 39%
Increased Focus on CRA Activity in Merger Review

- Banks have started providing much more detail in merger applications on how mergers will benefit the public than they used to.

More Data and Transparency

- Since 2020 have got 4 banks to commit to start tracking how much of their CRA eligible support is with organizations led by people of color.
- Several banks have published their EEO-1 report on their website.
WHAT DOES NCRC DO TO HELP?
What NCRC does to help

- Data analysis
- Sample comment letters
- Construct community benefits agreements
- Connect groups to a nationwide coalition
For a Deeper Dive

Read the [Community Reinvestment Act](#)

Research a bank at [FDIC BankFind Suite](#)

Learn about your state’s CRA or local RBO (Responsible Banking Ordinance) if you live in MA, IL, NY, RI, WV, WA or DC

Watch a video of a conversation with our CEO, Jesse Van Tol, and key regulators on proposed CRA reform
Thank you for joining us

If you are not a current NCRC member, join or renew online at ncrc.org/membership or, if you are an individual, joint the Just Economy Club at justclub.org.

Members get free access to the Fair Lending Tool (ncrc.org/2021-fair-lending-report), discounted tickets to the 2023 Just Economy Conference, access to data and custom research; as well as updates and opportunities to engage in our policy and advocacy work.
Questions?
Thank you for joining us

www.ncrc.org/membership
We’re a network of local and national nonprofits, government and educational institutions.
Together, we lead the movement for a #JustEconomy.

2023 Just Economy Conference
March 29 - 30, 2023
Washington Hilton
Washington, DC
America needs a new reality rooted in a Just Economy.

Come to the national event for community, policy, government, business and foundation leaders who work for fairness in lending, housing and business, and to make all Americans equal parts of the formula for national success.

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www.ncrc.org/events